



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

June 27, 2006

Avis Marie Russell
General Counsel
District of Columbia Water and Sewer Authority
5000 Overlook Ave, SW
Washington, D.C. 20032

Re: Priority Replacements Report (Paragraph 82)

Dear Ms. Russell,

EPA has received and reviewed the District of Columbia Water and Sewer Authority's ("WASA") May 9, 2006 report to meet the requirement to replace 1000 priority service lines pursuant to paragraph 82 of the Administrative order for Compliance on Consent (SDWA 03-2004-0259-DS) ("Order"). A number of inconsistencies were found.

EPA's review has identified a number of questions with respect to the report. Enclosure 1 sets out a list of questions and comments. This information is requested pursuant to Section 1445(a) of the Safe Drinking Water Act, 42 U.S.C. § 300j-4(a). Please submit the information to the address below by July 12, 2006.

Karen D. Johnson (3WP22)
Chief, Ground Water and Enforcement Branch
United States EPA Region III
1650 Arch Street
Philadelphia, PA 19103-2029

Please contact me at 215-814-5445 if you have any questions.

Sincerely,

A handwritten signature in cursive script that reads "Karen D. Johnson".

Karen D. Johnson, Chief
Ground Water and Enforcement Branch

Enclosure

cc: John T. Dunn, Chief Engineer/Deputy General Manager

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ENCLOSURE 1 – PRIORITY REPLACEMENTS REPORT

- The following locations were included in the September 30, 2005 Lead Service Line Replacement Report ("LSLR Report"), as amended on November 18, 2005 as priority replacements that took place during the 2005 replacement year. Please provide an explanation why they were not included in the May 9, 2006, Final Report for 2005 and 2006 Priority Replacements Report ("Priorities Report").

Address	quad	activity	activity date
██████████ Morse St	NE	full LSLR	23-Jun-05
██████████ Adams St	NW	partial LSLR	9-Jul-06
██████████ Longfellow St	NW	partial LSLR	1-Feb-05
██████████ Rosemont Ave	NW	partial LSLR	18-May-05
██████████ 17th St	NE	partial LSLR	17-Dec-04
██████████ Hurst Terrace	NW	full LSLR	14-Dec-04
██████████ Brothers Pl	SE	full LSLR	4-Jan-05
██████████ 16th St	NE	partial LSLR	16-Dec-04
██████████ Harrison		full LSLR	11-Jan-05
██████████ 12th St	NE	full LSLR	16-Dec-04
██████████ 10th St	NE	full LSLR	17-Dec-04
██████████ Lowell St	NW	full LSLR	26-Oct-04
██████████ 5th St	NE	full LSLR	30-Dec-04
██████████ Macarthur Blvd	NW	full LSLR	10-Jan-05
██████████ 19th St	NE	partial LSLR	17-Dec-04

- The following locations were included in the Priorities Report as priority replacements that took place during the 2005 replacement year. However, they were not included in the LSLR Report. Please provide an explanation why these replacements were not reported.

address	quad	activity	Activity date
██████████ Fairmont	NW	LSLR	22-Sep-05
██████████ Hamilton St	NW	LSLR	1-Oct-04
██████████ Hoban Road	NW	LSLR	6-Jul-05
██████████ Garfield St	NW	LSLR	13-Sep-05
██████████ 29th St	NW	LSLR	1-Dec-04
██████████ 13th St	NW	LSLR	6-Jun-05
██████████ Martin Luther King Jr. Ave	SW	LSLR	20-Nov-04
██████████ Quebec St	NW	LSLR	8-Oct-04
██████████ 41st St	NW	LSLR	27-Sep-05
██████████ Aspen St	NW	LSLR	16-Sep-05
██████████ Harvard St	NW	LSLR	12-Sep-05



3. The following locations were included in the Priorities Report, but were reported as non-priority replacements in the LSLR Report. Please explain the inconsistencies between these reports.

Address	quad	activity	activity date
████████ South Carolina Ave	SE	LSLR	29-Dec-04
████████ Hall Pl	NW	LSLR	31-Aug-05
████████ Woodley Pl	NW	LSLR	1-Aug-05
████████ NH Burroughs Ave	NE	LSLR	8-Oct-04
████████ 13th St NW	NW	LSLR	23-Feb-05
████████ F St	NE	LSLR	12-Jan-05

4. The following locations were listed as part the 1000 priority replacements pursuant to paragraph 82 of the Administrative Order. These locations were previously reported as having been previously counted as replaced through test-out during the 2003 replacement year. (See Appendix E of LSLR Report.) Please confirm that the replacements were counted and reported only once for each address for purposes of meeting the requirements of 40 CFR 141.84 and 141.90.

Address	quad	activity	activity date
████████ D St	NE	LSLR	10-Aug-05
████████ Q St	NE	LSLR	16-Aug-05
████████ New Jersey Ave	NW	LSLR	6-Apr-05
████████ 12th St	NE	LSLR	2-Mar-05
████████ 21st St	NW	LSLR	19-Jul-05
████████ Ridge Pl	SE	LSLR	29-Mar-05
████████ 13th St	NW	LSLR	8-Jun-05
████████ G St	NE	LSLR	24-Mar-05
████████ Upshur St	NW	LSLR	15-Oct-04
████████ Jenifer St	NW	LSLR	6-Jan-05
████████ Garfield	NW	LSLR	21-Jan-05
████████ Ayers Pl	SE	LSLR	12-Jan-05
████████ Jefferson St	NW	LSLR	25-Jul-05

